



PNGC's Comments on
BPA's Transmission Access for EIM Participation
April 20, 2016

As an NT customer of BPA's, PNGC and its member cooperatives depend on BPA's transmission system to reliably serve our customers. Any major change in the transmission system is of concern to us. We appreciate the effort that BPA is undertaking to protect its transmission system, and its ability to reliably provide transmission service to its load serving customers given this new use of BPA's transmission system.

BPA has explained how its use of Variable Transfer Limits (VTLs), evaluation of redirects associated with EIM participation, the sharing of real time information between the CAISO and BPA, monitoring of system performance, among other things, "effectively manages any commercial or reliability risks from customers using their FCRTS rights for EIM participation." (March 30 slides, slide 29) However, this is a dynamic situation. Impacts to BPA's transmission system could change as there is increased dispatch under the EIM and as more parties participate in the EIM using their FCRTS rights.

We ask BPA to hold regular meetings (once per quarter, or more often if events warrant) to update BPA's transmission customers on a variety of issues associated with EIM participation. These issues might include actual performance of the CAISO complying with the VTLs, system visibility given real-time info with the CAISO, curtailments and causes, modeling impacts, etc. BPA's improvements on its system, such as RAS automation, may also affect how EIM participation impacts that FCRTS and transmission customers' exposure to curtailment or redispatch. BPA's method of calculating and implementing VTL's may require an update. In short, this process is not "done". BPA should continue to keep customers informed on an ongoing basis about EIM participation using FCRTS rights and its impacts on other transmission customers' rights.

If you have any questions, please contact Aleka Scott.